

**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS**

LIONEL H. BROWN,	)	
	)	
Plaintiff,	)	No.:
	)	
v.	)	Notice of Removal from the Circuit Court of
	)	Cook County, Illinois, Law Division
MID-WEST TRUCK PARTS & SUPPLIER,	)	
LLC, and JEFFREY A. HATFIELD, JR.,	)	Case No. 16-L-4652
	)	
Defendant.	)	

**JEFFREY HATFIELD, JR'S NOTICE OF REMOVAL**

Defendant, Jeffrey Hatfield, Jr., by its attorneys, Timothy J. Young and Ronald W. Payne of Lewis Brisbois Bisgaard & Smith LLP, and pursuant to 28 U.S.C. §1441, 28 U.S.C. §1446 and 28 U.S.C. § 1332, hereby files its Notice of Removal of this cause to the United States District Court for the Central District of Illinois, from the Circuit Court of Cook County, Illinois, and respectfully states:

1. On May 9, 2016, Plaintiff, Lionel H. Brown, filed an action in the Circuit Court of Cook County, Illinois, entitled *Lionel H. Brown v. Mid-West Truck Parts & Supplier, LLC and Jeffrey Hatfield, Jr.*, Case No. 2016 L-004652. Defendant Hatfield in said action now files this Notice of Removal. Upon receiving a file-marked copy hereof, Defendant will serve this Notice of Removal upon the other parties hereto and file a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County, Illinois.

2. Plaintiff is a resident of the State of Illinois. He resides at 18329 West St., Lansing, Illinois, 60438. Upon belief, Plaintiff is also a citizen of the State of Illinois.

3. Defendant Jeffrey Hatfield, Jr., is a resident and citizen of the State of Kentucky.

4. Defendant Mid-West Truck Parts & Supplier, Inc. is a corporation, incorporated under the laws of Indiana with its headquarters located in Tell City, IN. Mid-West Truck Parts & Supplier, Inc.'s principle place of business is in Indiana.

5. Mid-West Truck Parts & Supplier, Inc.'s ownership group is comprised of two individual persons; Donald Riley and Justin Riley.

6. At the time that the underlying complaint was filed and at the time of the filing of Jeffrey Hatfield's notice of removal, Donald Riley was and continues to be a citizen of the State of Kentucky.

7. At the time that the underlying complaint was filed and at the time of the filing of Jeffrey Hatfield's notice of removal, Justin Riley was and continues to be a citizen of the State of Kentucky.

8. Plaintiff commenced this cause of action on May 9, 2016, by filing his Complaint and having summons issued thereupon. A summons and copy of the Complaint were served on Mid-West Truck Parts & Supplier, Inc. on May 18, 2016.

9. Jeffrey Hatfield received a service of a summons on or about July 22, 2016. Copy of the Complaint is attached hereto as Exhibit A.

10. The Complaint alleges that the Plaintiff, Lionel Brown, was traveling in his Ford Expedition in Charleston, Illinois, when Hatfield, driving a 2000 Peterbilt tractor-trailer, rear-ended Brown's vehicle causing him injury.

11. The amount in controversy in this cause exceeds \$75,000. Plaintiff alleges that he sustained injuries in an amount in excess of the jurisdictional limit of the Cook County Law Division, which is \$50,000. Under Illinois law, Plaintiff may recover any amount awarded to him over \$50,000 if proven. According to medical records Plaintiff had back and wrist complaints,

among other complaints, after the accident. Further, Plaintiff's counsel has provided medical bills in excess of \$75,000 with ongoing treatment. With expected claims of wage loss and pain and suffering complaints it is expected that the Plaintiff's expectations in this case are far in excess of \$75,000.

12. Because this controversy is entirely between citizens of different states and the amount in controversy exceeds \$75,000, this Defendant desires to remove said cause from the Circuit Court of Cook County, Illinois to the United States District Court for the Central District of Illinois based on diversity jurisdiction.

13. Defendant Mid-West Truck Parts & Supplier, Inc., consents to the removal of this matter to the United State District Court for the Southern District of Illinois.

WHEREFORE, Defendant, Jeffrey Hatfield, Jr., respectfully requests that this case proceed before the United States District Court for the Central District of Illinois as an action properly removed.

Dated: August 9, 2016

Respectfully submitted,

**LEWIS BRISBOIS BISGAARD & SMITH**

By: /s/ Ronald W. Payne  
One of the Attorneys for Defendant  
Jeffrey Hatfield, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2016, I electronically filed the foregoing with the Clerk of the U.S. District Court for the Central District of Illinois, using the CM/ECF filing system, and mailing copies to the attorneys listed below, via US Mail from 550 W. Adams St., Chicago, IL, with proper postage prepaid:

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